IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

HAITIAN EVANGELICAL CLERGY
ASSOCIATION; SERVICE EMPLOYEES
INTERNATIONAL UNION – LOCAL 32BJ;
SABINA BADIO FLORIAL; YOUDELAINE
DORCIN; ROBERT JEAN ALIX ERINAC;
RACHELLE GUIRAND; DIEU YOLNICK
JEUNE CADET; AUDOINE AMAZAN; GERALD
MICHAUD; NADEGE JOSEPH MICHAUD; and
MARIE WILDRIGUE ERINAC MIOT,

Case No. 1:25-cv-01464-BMC

Plaintiffs,

– versus –

DONALD J. TRUMP, President of the United States of America; UNITED STATES OF AMERICA; THE DEPARTMENT OF HOMELAND SECURITY; and KRISTI NOEM, Secretary of Homeland Security,

Defendants.

NOTICE OF MOTION TO WITHDRAW AS ATTORNEY OF RECORD

PLEASE TAKE NOTICE that, pursuant to Local Civil Rule 1.4, Dinesh McCoy respectfully moves to withdraw as counsel for Plaintiffs in the above-captioned action. Mr. McCoy ended his employment at Just Futures Law and no longer has responsibility for this case. Plaintiffs remain represented by other counsel of record in this matter. Pursuant to Local Civil Rule 1.4, an affidavit supporting this motion is unnecessary because Sejal Zota of Just Futures Law continues to represent the Plaintiffs in this matter. A copy of this motion has been served on counsel for all parties by ECF.

DATE: December 23, 2025

Respectfully submitted,

/s/ Dinesh McCoy
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